

EXHIBIT A

STATE OF NEW YORK
SUPREME COURT: COUNTY OF ERIE

KAREN PETERSEN
76 Eiseman Avenue
Kenmore, New York 14217

Plaintiff.

SUMMONS

v.

WALMART INC.
3290 Sheridan Drive
Amherst, New York 14226

Defendant.

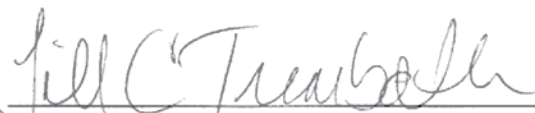
TO THE ABOVE NAMED DEFENDANT:

YOU ARE HEREBY SUMMONED and required to serve upon plaintiff's attorney an answer to the complaint in this action within twenty (20) days after the service of this summons, exclusive of the day of service, or within thirty (30) days after service is complete if this summons is not personally delivered to you within the State of New York. In case of your failure to answer, judgment will be taken against you by default for the relief demanded in the complaint.

The basis of the venue designated is residence of plaintiff, which is: Erie County, New York.

DATED: May 24, 2021
Buffalo, New York

By:



Jill C. Trembath, Esq.
Multerer Law Firm, PLLC
Attorneys for Plaintiff
656 Elmwood Avenue-Suite 300
Buffalo, New York 14222
(716) 882-8828

STATE OF NEW YORK
SUPREME COURT: COUNTY OF ERIE

KAREN PETERSEN,

Plaintiff,

COMPLAINT

v.

Index No.:

WALMART INC.

Defendants

Plaintiff, KAREN PETERSEN, by her attorneys, Multerer Law Firm, PLLC, as and for her complaint against defendant WALMART INC., alleges upon information and belief:

1. At all times herein relevant, plaintiff KAREN PETERSEN was a resident of the County of Erie and State of New York.
2. At all times herein relevant, defendant WALMART INC. is a foreign business corporation authorized to conduct business in the State of New York with a principle place of business located at 3290 Sheridan Drive in the Town of Amherst, County of Erie and State of New York.
3. At all times herein relevant, defendant owned the land and buildings located at 3290 Sheridan Drive in the Town of Amherst, County of Erie and State of New York, hereinafter referred to as "Property".
4. At all times herein relevant, defendant had possession and control of the Property and were responsible for its construction, inspection, maintenance, and condition.
5. At all times herein relevant, defendant operated a store/business at the Property.
6. That on or about June 18, 2018 at approximately 2:30 p.m. plaintiff was legally on

defendant's Property and was a patron of same.

7. On or about June 18, 2018 at approximately 2:30 p.m., plaintiff KAREN PETERSEN was caused to slip and fall on the aforementioned Property, thereby sustaining personal injuries.

8. The accident described above and the injuries sustained by plaintiff KAREN PETERSEN resulted solely as a result of defendant's negligence without any negligence attributable in any measure to plaintiff.

9. As a result of the negligence of defendant, plaintiff KAREN PETERSEN was severely and permanently injured, suffered and continues to suffer pain, mental anguish, and medical expenses for her care and treatment, all of which, upon information and belief are permanent.

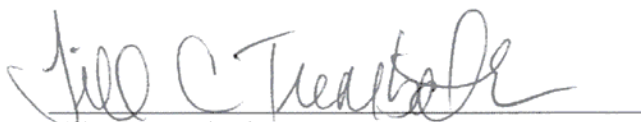
10. Plaintiff KAREN PETERSEN has been damaged in an amount that exceeds the jurisdictional limits of all lower courts.

11. The provisions of CPLR Article 16 regarding limited liability do not apply.

WHEREFORE, plaintiff demands judgment against defendant, in an amount that exceeds the jurisdictional limits of all lower courts, and plaintiff demands such other, further and different relief as to the Court may seem just and proper, together with the costs and disbursements of this action.

DATED: May 24, 2021
Buffalo, New York

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